UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

JAN 10 2017

RCRA

559661

Mr. Lawrence C. Rosen
Environmental Operations, Inc.
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: Comments on the Vapor Intrusion – Sub-slab Sampling Report for the Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency in consultation with the Missouri Department of Natural resources has completed its review of the subject document dated December 15, 2016, and is providing the following comments to be incorporated into a revised submittal.

1. Page 3, Sample Collection – During sampling of sub slab location SSV-3, it was observed that the flow control valve portion of the sampling apparatus was bent, prohibiting air flow into the canister. The sampling apparatus was disassembled to remove the bent section and reassembled without the flow control valve or pressure gauge. Therefore, the sample was collected without knowing the canister pressure. This information should be included in the report.

2. Page 4, Sample Collection and Sample Receipt – This section states that there was an equipment malfunction regarding the canisters in-line gauge for sub slab location SSV-3. The inline pressure gauge was removed from the sampling apparatus prior to collecting the sample due to a bent section that contained the pressure gauge. Therefore, the canister pressure was unknown during sampling. This information should be included in the report.

3. The field notes from the sampling event should be included as an appendix to the report.

I can be reached at (913) 551-7755 or by email at morrison.bruce@epa.gov if you have any questions concerning these comments.

Sincerely,

Bruce A. Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
Rich Nussbaum, MDNR